

**To:** Caroline Boulton[caroline\_boulton@ios.doi.gov]  
**Cc:** Clarice Julka[clarice\_julka@ios.doi.gov]; Ryan McQuighan[ryan\_mcquighan@ios.doi.gov]  
**From:** Lurie, Maria  
**Sent:** 2017-11-01T08:47:46-04:00  
**Importance:** Normal  
**Subject:** Fwd: FOIA Request of April 6, 2017, OS-FOIA-2017-00413  
**Received:** 2017-11-01T08:48:34-04:00  
[Redline 1st Amended Complaint in Center for Biological Diversity v. U.S. DOI, \(D.D.C., Sept. 6, 2017\).pdf](#)

Dear Ms. Boulton:

The U.S. Department of Justice must file a status report with the U.S. District Court for the District of Columbia this Friday, November 3, concerning the above referenced FOIA request, which is in litigation. (b)(5) ACP

Should you have any concerns about this matter, please contact me at your convenience. My direct dial is 202.208.7272. Also, please note that I have copied OS FOIA's team of Clarice Julka and Ryan McQuighan on this message.

Regards,

**Maria Lurie**  
Attorney Advisor  
U.S. Department of the Interior  
Office of the Solicitor  
Division of General Law

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----- Forwarded message -----

**From:** Lurie, Maria <maria.lurie@sol.doi.gov>  
**Date:** Mon, Oct 16, 2017 at 12:38 PM  
**Subject:** FOIA Request of April 6, 2017, OS-FOIA-2017-00413  
**To:** Caroline Boulton <caroline\_boulton@ios.doi.gov>

Dear Ms. Boulton:

I am an attorney in the Office of the Solicitor, where I serve as agency counsel for a FOIA lawsuit captioned *Center for Biological Diversity v. U.S. Dep't of the Interior*, No. 17 1595 (D.D.C., Sept. 6, 2017). The suit alleges that the Department has yet to provide the requester with reasonably segregable portions of the requested records.

For our purposes, the records at issue concern all of Secretary Zinke's communication records, "including but not limited to, all letters, emails, text messages, instant messages, voicemails, and phone logs for any phones utilized by ... Secretary of the Interior Ryan Zinke ... from any and all agency and [Interior Department] servers, cloud portals, secure websites, computers, tablets, smart phones, etc., send to and/or from Mr.

Zinke, with the exception of any records that are or will be publicly available (e.g., through [regulations.gov](https://www.regulations.gov)." See Revised Complaint of 9/6/17 at ¶ 27.

(b)(5) ACP



Should you have any questions about this litigation, please contact me at your convenience. My direct dial is 202.208.7272. And, for your convenience, a copy of the complaint is attached for your ready reference.

Regards,

**Maria Lurie**

Attorney-Advisor  
U.S. Department of the Interior  
Office of the Solicitor  
Division of General Law

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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

CENTER FOR BIOLOGICAL DIVERSITY,  
378 N. Main Avenue  
Tucson, AZ 85701,

Plaintiff,

v.

U.S. DEPARTMENT OF THE INTERIOR,  
1849 C. Street, NW  
Washington, D.C. 20240,

Defendant.

Case No.: 17 cv 01595 RC

**FIRST AMENDED COMPLAINT FOR  
DECLARATORY AND INJUNCTIVE  
RELIEF**

(b) (5) - ACP, (b)(5) AWP




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(b)(5) ACP, (b)(5) AWP



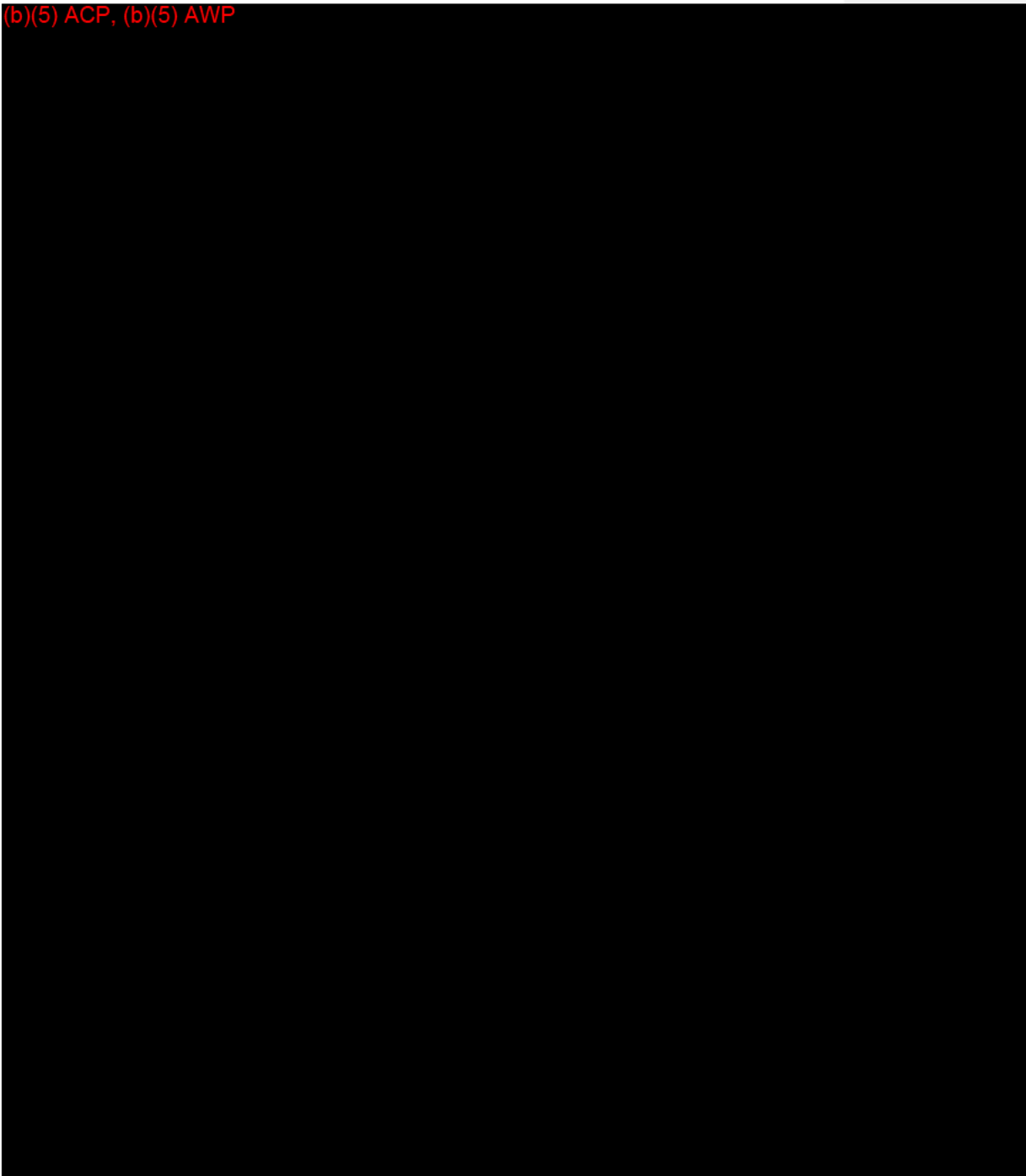
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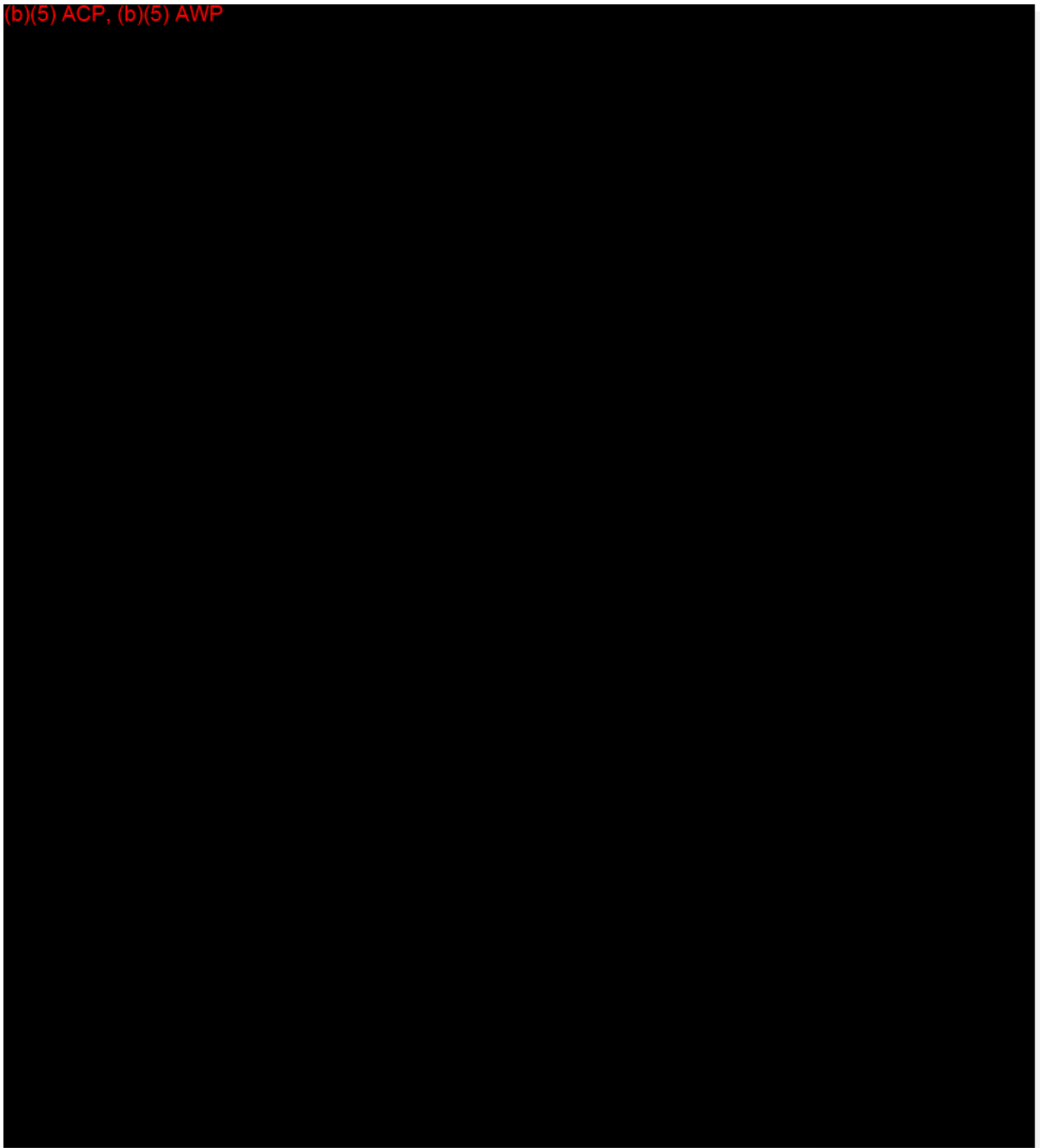
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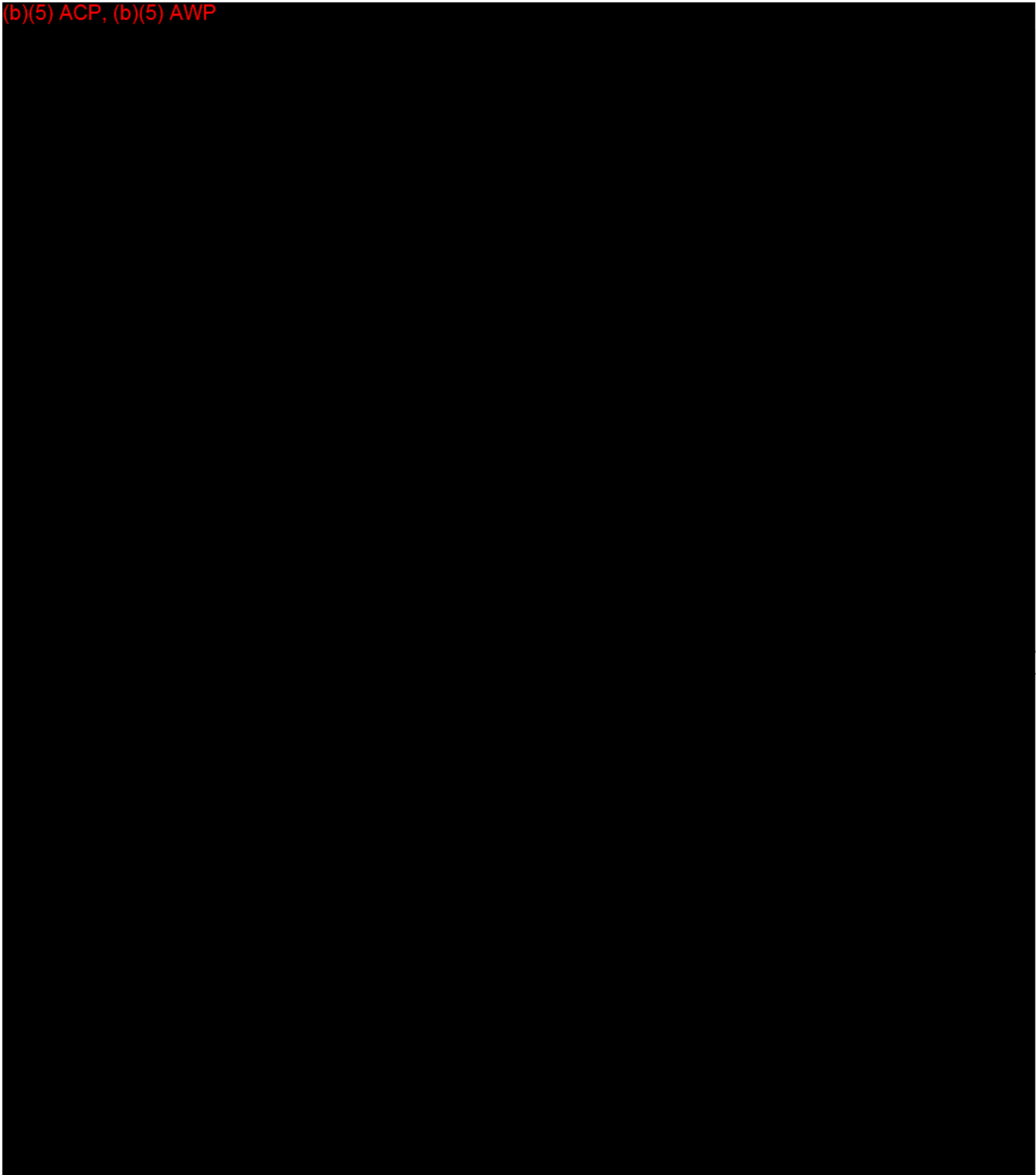




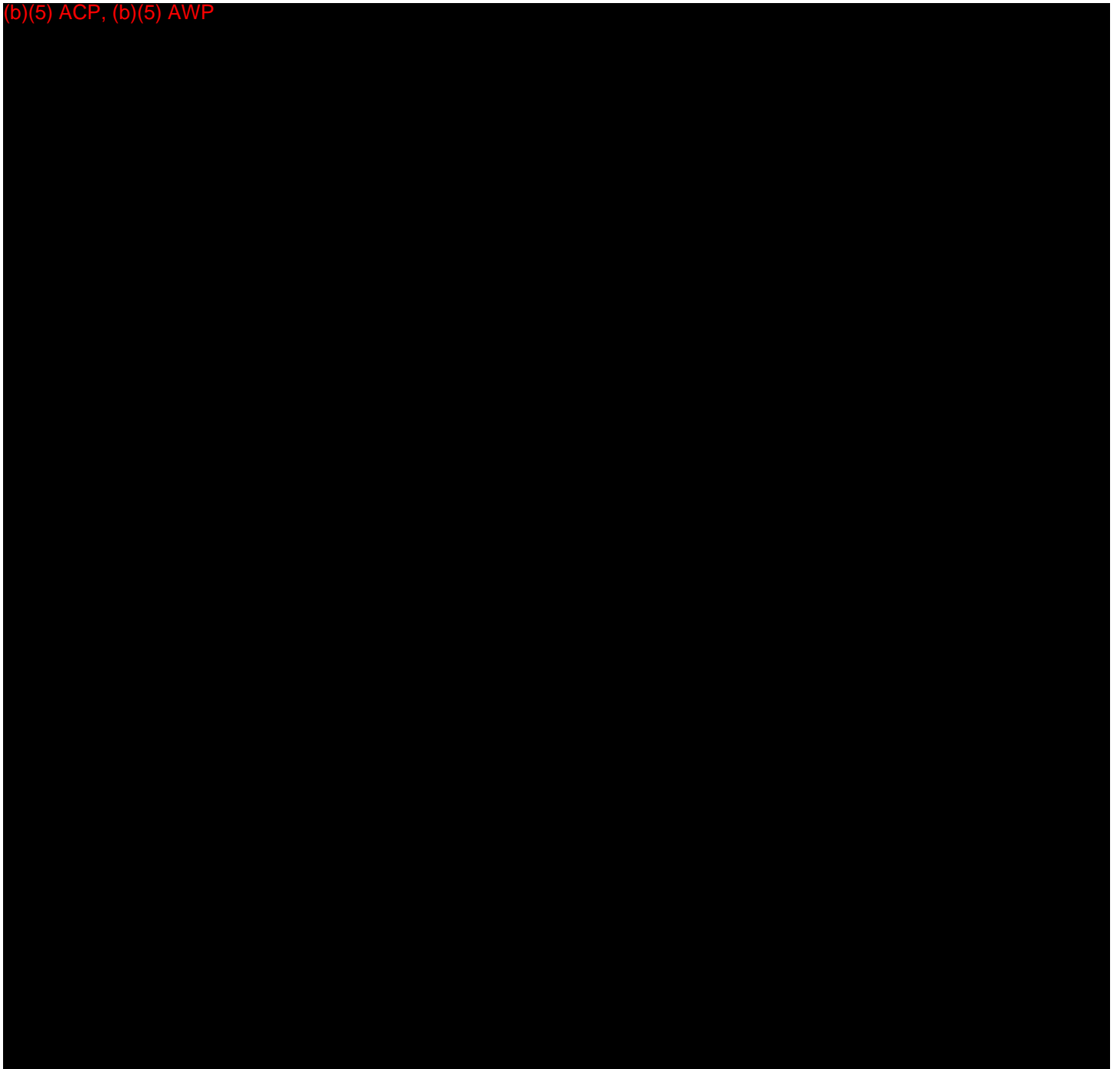
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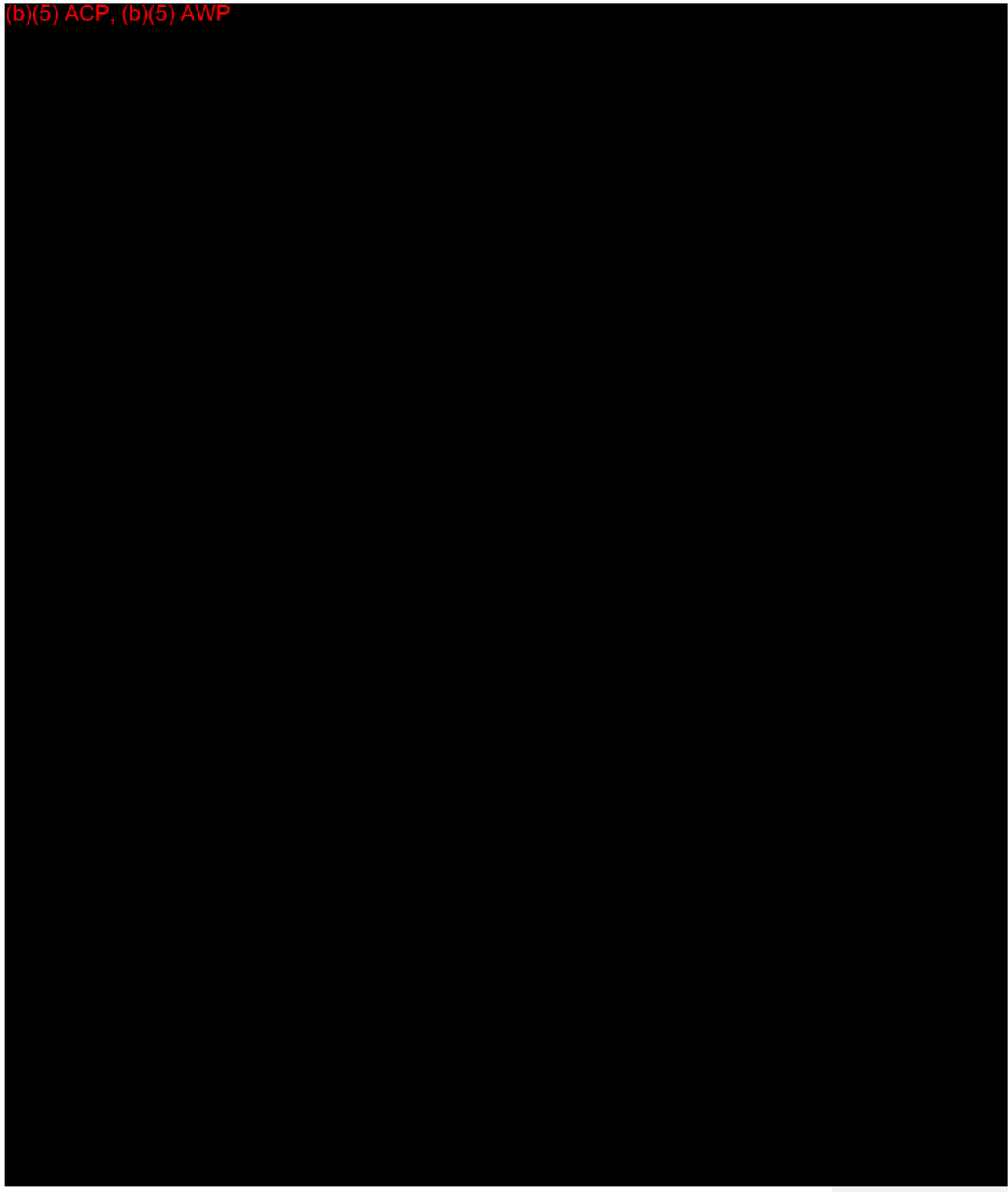
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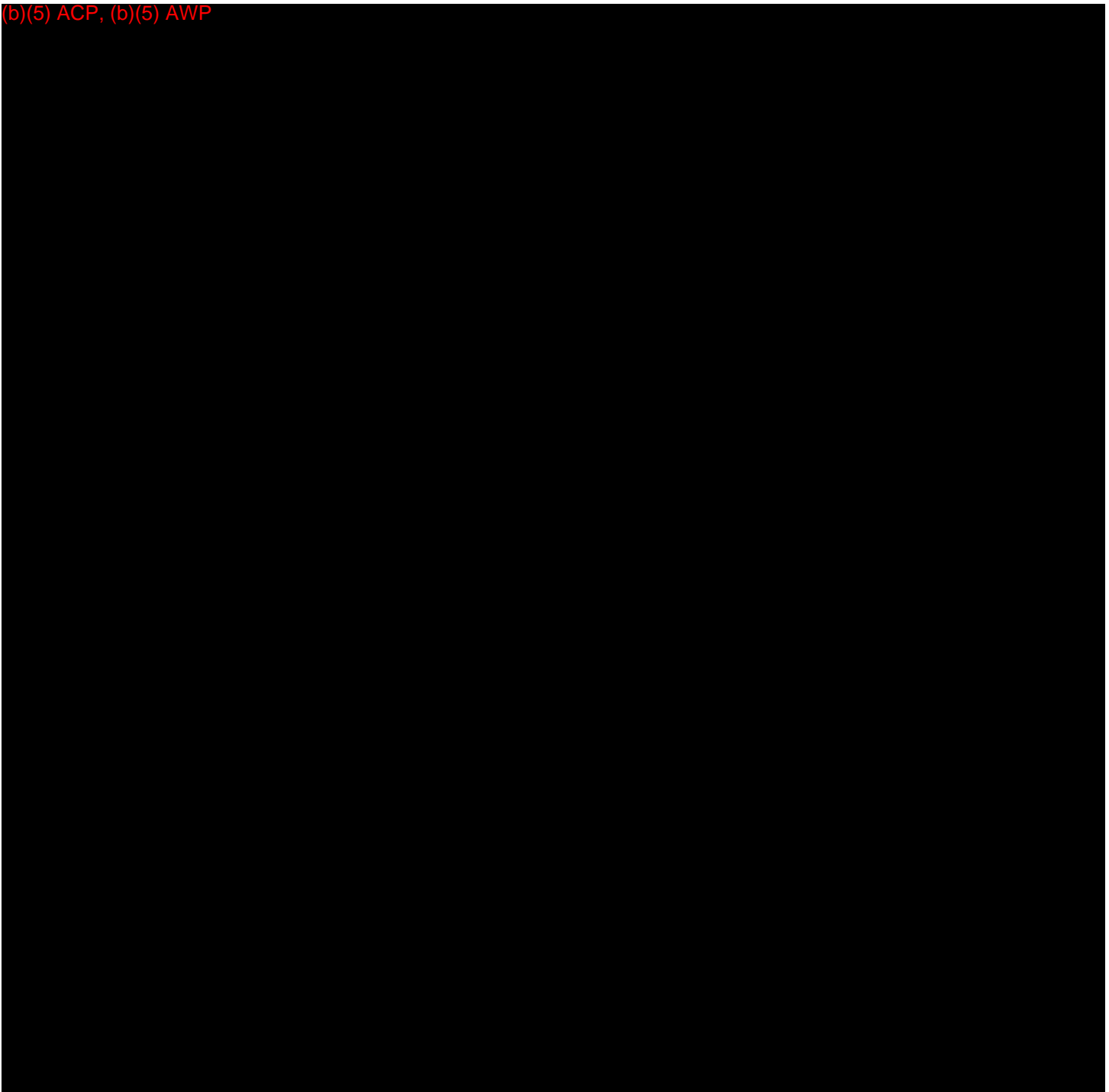
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(b)(5) ACP, (b)(5) AWP

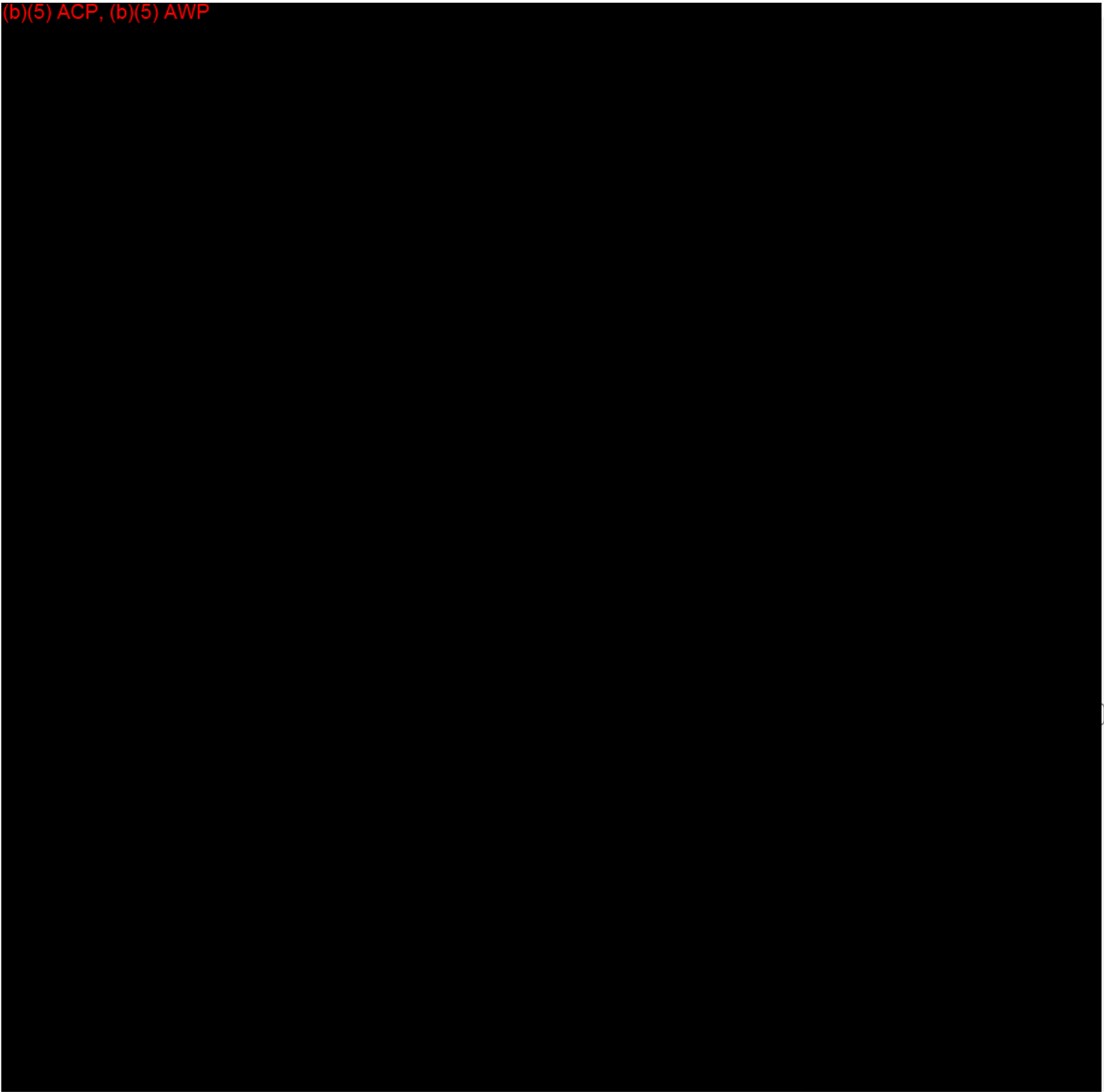




(b)(5) ACP, (b)(5) AWP




(b)(5) ACP, (b)(5) AWP



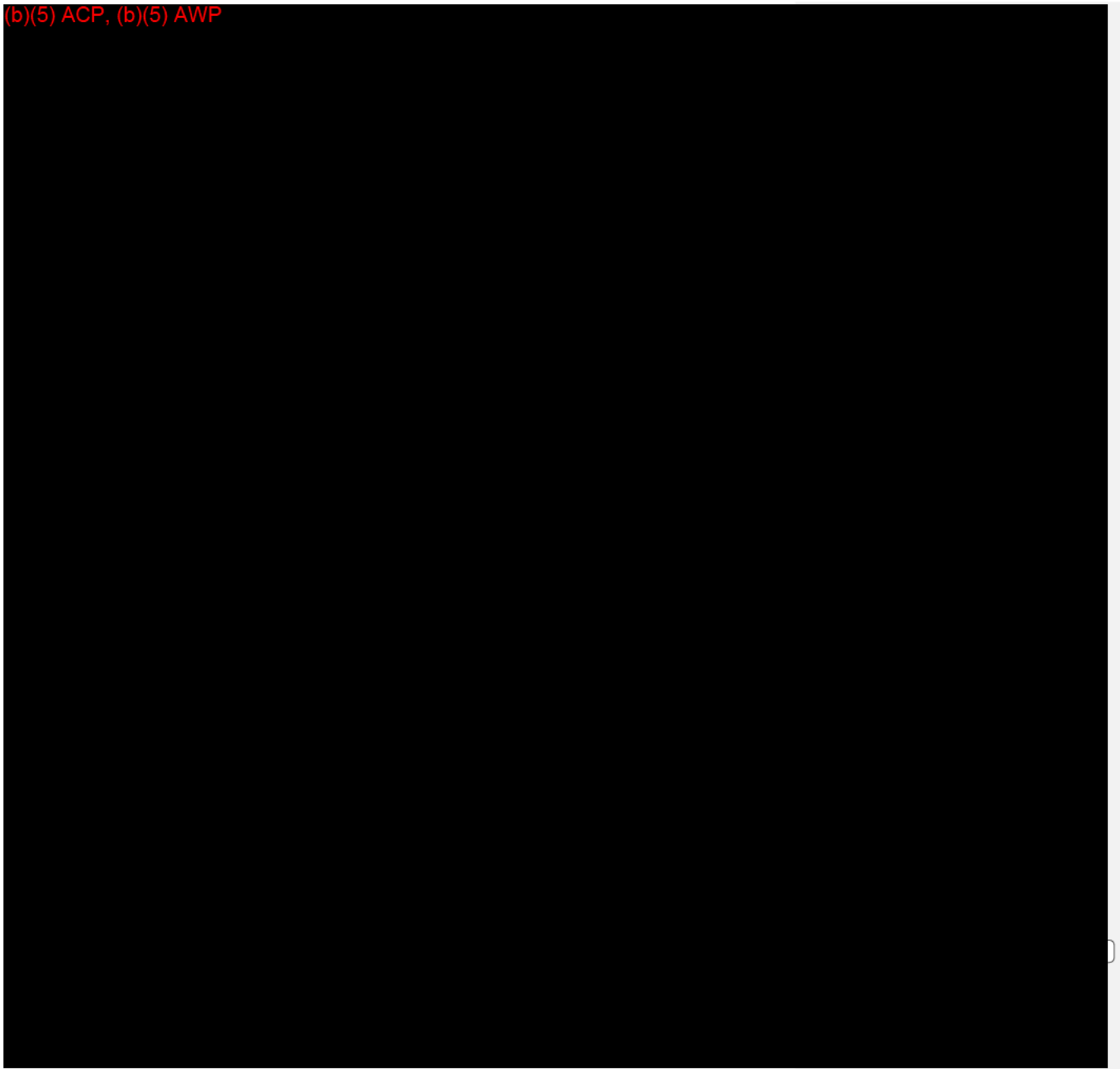
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(b)(5) ACP, (b)(5) AWP



(b)(5) ACP, (b)(5) AWP



(b)(5) ACP, (b)(5) AWP



/s/ Amy R. Atwood  
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